

Sierra Club

Thank you. And my name is Victoria Leistman. I'm a field organizer with the Sierra Club. Contact is victoria.leistman@sierraclub.org. And I'm also commenting today as part of the Standard Oil Coalition, which is a coalition of groups opposed to new oil terminals and an increase in oil transport through the northwest while working to increase safety measures in oil that is currently moving through the region. And I wanted to start just by reading a comment that was submitted by over 500 people to the Department of Ecology regarding this permit.

"I'm deeply concerned about the renewal of the National Pollutant Discharge Elimination System water quality permit for the U.S. Oil refinery on the Tacoma Tideflats and the limited protections it provides to Tacoma from ongoing water pollution as well as future impacts from any proposed facility expansion. U.S. Oil currently accepts tar sands, a heavy oil that can sink and submerge while spilled, and becomes nearly impossible for full recovery. With their purchase of U.S. Oil in 2018, Par Pacific has made it clear that they plan to expand the facility, increasing shipping of crude oil by both rail and tanker. Any expansion of this facility would further expose Washington communities on the Salish Sea to a much greater risk of oil pollution. The draft permit does not go far enough to ensure strong enforcement of toxic discharges from the facility; nor does it address possible changes and impacts that would arise from a facility expansion. Ecology is being too lenient by allowing U.S. Oil to discharge contaminated stormwater without ensuring it has met water quality standards first. Additionally U.S. Oil is contaminating our waters with copper and zinc, toxins known to kill salmon, a shared resource that is already facing dwindling population numbers. Ecology should implement numerical standards for these pollutants now, not after the permit has been issued. The permit also does not evaluate the additional water pollution impacts of possible expanded operations at U.S. Oil which could occur during the five-year period of this permit. I urge the Department of Ecology not to renew the U.S. Oil NPDES water quality permit until you have done everything you can to assure the protection of our waters and our communities from these extremely dirty pools. Further, I urge Department of Ecology to make clear its role and intentions to comprehensively review additional water and air quality impacts resulting from any proposal to expand U.S. Oil refining, storage or translating capacity. While U.S. Oil begins expanding their facility, Ecology must reevaluate their water quality impacts and reissue this permit with more protective standards and urgent restrictions. Thank you for your work to protect Washington communities and clean water."

And that's the end of the comment that was submitted by so many people. And I just want to name also that, you know, while we know this permit isn't about the expansion and that's been stated several times - and I want to be really clear that we're also substantively commenting on the NPDES permit itself - you know, we also have a facility that's being built here in Tacoma without all of the permits that it needs, and so the liquefied natural gas facility that's being built by Puget Sound Energy, and Department of Ecology including - as well as the Army Corps of Engineers, the City of Tacoma, the Puget Sound Clean Air Agency, none of these agencies have enforced a stop work order on that project without its permits. So we're now at a stage as an organization and the public that we want to be getting ahead of the game of these expansions to make sure that we're engaging with agencies early on; when a company like Par Pacific has stated explicitly in its plans that it wants to expand, that we're engaging with you early on in that process, in your regular processes, to make sure that you know that the public is very concerned about that and will be engaging throughout the process. So that's sort of where we're coming from and wanting to address the expansion very early on while also substantively comment on what's going on with the permit as it is.

And I really appreciate the time for the two-hour almost Q and A. I think that's really important. And I hope to also have further conversations with you all about what environmental justice looks like in Tacoma and who needs to be at the table for that because Sierra Club is probably at the bottom of the list on who needs to be at the table.